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February 26, 2015

The Honorable Jesse M. Furman  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:     *In re: General Motors LLC Ignition Switch Litigation,***  
14-MD-2543 (JMF)

Dear Judge Furman:

Lead Counsel and counsel for General Motors LLC (“New GM”) write to respectfully request an extension of the deadlines to (a) submit the proposed Common Benefit Assessment Order (CBAO), which is presently due on February 27, 2015 pursuant to Section VIII of Order No. 33 (Doc. No. 548) and (b) submit the proposed supplemental deposition order protocols, which are presently due on March 4, 2015 pursuant to Paragraph 46 of Order. No. 36 (Doc. No. 604).

The parties request a one-week extension for the CBAO, until March 6, 2015, on the basis that the parties are continuing to meet and confer (a process that is likely to eliminate or narrow areas of disagreement), and the parties also request a one-week extension regarding the deposition protocols, until March 11, 2015, to allow Plaintiffs to continue to confer with counsel in the Coordinated Actions.

Respectfully Submitted,

/s/ Steve W. Berman  
/s/ Elizabeth J. Cabrer  
/s/ Robert C. Hilliard

*Lead Counsel for Plaintiffs*

cc:     Counsel of Record for the Defendants